



September 4, 2019

Ms. Sheila McConnell  
Director, Office of Standards, Regulations and Variances  
Mine Safety and Health Administration (MSHA)  
U.S. Department of Labor  
201 12<sup>th</sup> Street South, Suite 4E401  
Arlington, VA 22202

Subject: Program Policy Letter No. P18-IV-\_\_ ; Escapeways and Refuges in Underground Metal and Nonmetal Mines (30 CFR 57.11050); Docket No. MSHA-2018-0015

Dear Ms. McConnell:

We write on behalf of the underground producer member companies of the Industrial Minerals Association – North America (IMA-NA), the National Lime Association (NLA) and the National Mining Association (NMA) to request at least a 30-day extension of the time to comment on the above-referenced matter.

MSHA recently published in the *Federal Register* a Notice of Availability of Program Policy Letter and Request for Comments on Program Policy Letter No. P18-IV-\_\_ (PPL), 84 Fed. Reg. 36623 (July 29, 2019). Pursuant to the notice, comments must be received by midnight (EDT) on September 27, 2019. The affected member companies of IMA-NA, NLA and NMA are in the process of reviewing the PPL with the intent of filing meaningful and constructive comments. However, the brief requested extension would significantly improve the likelihood those comments will be meaningful and constructive.

In one case, the IMA-NA Safety and Health Committee is scheduled to meet on September 25 during that association's Annual Meeting, September 24-26. The current comment period closes on September 27. The requested extension would afford IMA-NA much-needed time to focus proper attention on the PPL and on the comments it intends to submit. The extension would serve NLA and NMA similarly.

We trust that MSHA will consider our request for a minimum 30-day extension of the time frame indicated in the *Federal Register* notice to comment on the PPL. As always, we welcome the opportunity to engage in open dialogue with MSHA on matters related to mine safety and health.

We hope for a timely and favorable response to this request.

Sincerely,

Mark Ellis  
President  
IMA-NA

Bradford Frisby  
Deputy General Counsel  
NLA

Thomas Harman  
Senior Director,  
Safety & Health  
NMA